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To: Judy Smith/R10/USEPA/US@EPA

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Subject: WRK Field Sampling Plan Comments -- Thanks!

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07/07/03 09:26 PM

Willamette Riverkeeper
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Memorandum

June 25, 2003

To: Portland Harbor CAG Evaluation Committee

From: Travis Williams

Re: Comments on Round 2A Field Sampling Plan

Willamette Riverkeeper offers the following general comments on the Round 2A, Field Sampling Plan:

1. The goals of the Round 2A sampling are listed as providing supportive data for site characterization relative to sediment, assessment of benthic risks from contaminants in sediment and potential general impacts and specific human health risks relative to sediment. In some instances it is not likely that the number of samples proposed will provide enough data to statistically demonstrate or describe these impacts.
2. One of the general comments on the programmatic work plan was the lack of consistency in identifying whether the intended area of study was limited to the ISA or included other portions of the River. While this work plan does a better job, especially in Section 2, there is still some need for clarity in other portions of the document.
3. There are a number of instances throughout the document wherein additional supportive information would be useful in order to determine whether the proposed sampling will adequately meet the stated goals.
4. Where sampling goals are related to specific issues in the programmatic work plan, citations should be provided or a brief description included in this text as to how and where the data will be used. Many times the information provided in this work plan is too vague.
5. Some of the decisions on sediment sampling locations seem to be based on historical data. Given the dynamic nature of the river, how well does the historical data represent current conditions, and how suitable is this data for identifying sampling locations to characterize current conditions?

Specific Comments:

1. Section 1, Page 1, First bullet. Does site characterization refer to the ISA or include areas outside of the ISA? How, when and under what circumstances will other areas be included?
2. Section 1.1.2, Page 4, Fourth bullet. Evaluation of existing upland site information is listed as a Round 1A activity. Is this complete, how and when was this conducted, what type of information is being collected, who is providing it, who is reviewing it? What criteria are being used as part of the review and how will this information be used? No report is cited as having been submitted. If these reviews have not been completed or submitted, then how is it they have been cited as being "helpful in selecting Round 2A sediment sample locations" (Page 5).
3. Section 1.1.3, Page 5. Will potential impacts to human health from

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contaminated sediments be addressed? This is not listed as a goal of Round 2A sampling. How and where will potential impacts to human health from surface water be addressed?

4. Section 1.1.3, Page 6, Round 2B sampling, Bullets 4,5,6. These items have the potential of identifying new source areas, why are they being evaluated so late in the sampling scheme? Identification of sources is listed as a Round 1 task. (Page 4).

5. Section 1.1.3, Page 6, Round 2B sampling, Bullet 7. Where will the data collection to assess natural attenuation take place? How will that location be selected. Will this be addressed in a separate work plan?

6. Section 1.2, Pages 7-8. It is unclear in this paragraph what the relationship will be between information gathered in the ISA and outside of the ISA. What is the purpose of the data collected outside the ISA, how would that data be used? What criteria were used to determine those locations?

7. Section 1.2.1, Page 8, Surface Water, Last paragraph. Page 3 describes collection of data at 10 transect locations. Why are only 3 locations selected for surface water chemistry? Given the size of the ISA and variations within that area, it is unlikely that 3 locations will provide sufficient data to "develop and understanding of the chemicals present and the ranges of concentrations in the water column under different flow conditions and water depths".

8. Section 1.2.2 Ecological Risk Assessment. Where in the programmatic work plan are the tasks identified in this section described? It is difficult to ascertain whether the type and amount of data collected in these sampling events will provide sufficient statistically sound data to perform these tasks.

9. Section 1.2.3, Human Health Risk Assessment. Which scenarios will this data support? What about potential impacts from ingestion of sediment and dermal contact with sediment? Why are these media not included in the human health section? There was also some discussion about potential impacts from groundwater seeps, how and where will this be addressed?

10. Section 2.1.1, Page 12, Ecological Risk Assessment. How will river dynamics be accounted for in the development of a model for co-location? Where is the development of the predictive model described? What if a predictive relationship can not be found, what alternatives will be used for evaluating ecological impacts from sediments. How will the data collected in Round 2 support this effort?

11. Section 2.1.2, Page 14, Third paragraph. See comment #4.

12. Section 2.1.2, Page 15, Ecological Risk Assessment, First bullet. What is the source of this information? Is the primary intent of the sediment sampling and bioassays to demonstrate co-location? What if that can't be done?

13. Section 2.1.2, Page 16, #2 This could be explained a little more clearly. Was an exceedance factor calculated at each location?

14. Section 2.1.2, Page 16, #3. This could be explained a little more clearly. Were the exceedance factors for metals and PAHs consistently the same throughout the ISA? What implications are being drawn from this?

15. Section 2.1.2, Page 17, Second paragraph. It is unclear whether the number of samples in non Tier I areas will be of sufficient number and statistical strength to identify these properties as a significant new source. What criteria will be used to make that determination given that the sampling is biased towards known areas?

16. Section 2.1.2, Page 18. It is unlikely that the limited number of proposed sampling locations would be sufficient to adequately characterize downriver conditions to the extent needed for adjusting the boundaries of the ISA.

17. Section 2.1.2, Page 28 See comment #16.

18. Section 2.1.2, Page 29 RM 8 - 9 See comment #16.
 19. Section 2.1.5, Page 30. As some sources may not be identified until the Round 3 sampling, and it is unclear whether the data review from the Round 1 file review of upland sources is complete, is there sufficient data currently available to justify limiting the selection of analytes? Why are dioxins and furans being limited?
 20. Section 2.2.1, Human Health Risk Assessment, Page 31. What impact does limiting surface water data to low flow conditions for purposes of the HHRA have on the overall data set? Will there be a sufficient number of samples collected to provide good site characterization and statistically sound data for this human health scenario?
 21. Section 2.2.2, Page 32, Site Characterization. The question of sufficient number of samples is again at issue here. The sampling locations seem to indicate that only current use is considered. Where will future use conditions be addressed in terms of site development and increased river use as planned and proposed by the surrounding community?
 22. Section 2.2.2, Page 32, Ecological Risk Assessment. The question of sufficient number of samples is again at issue here. The sampling locations seem to indicate that only current use is considered. Where will future restoration and enhancements be addressed in terms of site development and increased river use?
 23. Section 2.2.2, Page 33, Human Health Risk Assessment. See comment #21.
 24. Appendix A. Tables 2a and 2b are confusing and don't appear to match the text in Section 3.3 Page 4. As this provides the basis for the sampling depth, it would be important to make sure it is clearly illustrated and understood.
- For additional information, contact: Travis Williams, Willamette Riverkeeper, 503-223-6418